



Privacy Notice for Staff International Mobility

This is a privacy notice that is based on Articles 13 and 14 of the EU General Data Protection Regulation.

Controller

Turku University of Applied Sciences Ltd

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Person in charge and contact persons

Mervi Raita, Head of HR Services

Mirva Virtanen, Recruitment and HR Advisor

Contact information of Data Protection Officer

Please contact in all data protection related matters:

tietosuoja@turkuamk.fi

The messages sent to this address are processed by the Data Protection Officer (DPO) and a data protection specialist working with them and as their substitute.

Purpose of processing personal data

The primary purpose of processing personal data is to enable international mobility activities between higher education institutions and to support the statistical tracking and reporting of international activities in accordance with official guidelines. Additionally, the data is used for communication, managing partnerships, and ensuring the safety of employees participating in international staff exchanges and mobility.



For international mobility events (such as international weeks or days and, for example, international project meetings), data is processed to organize the event and to communicate about it.

International mobility by staff at Turku University of Applied Sciences is always considered business travel. A separate privacy notice for travel management describes how the personal data of Turku UAS staff is processed in connection with travel arrangements and reimbursement of travel expenses for trips abroad.

Legal basis for processing personal data

Several legal bases for processing personal data apply within the scope of international mobility activities:

- When granting an Erasmus grant for staff mobility and processing documents related to an employee's mobility period, the legal basis for data processing is a contract (processing is necessary for the performance of a contract to which the data subject is party, or to take steps at the request of the data subject prior to entering into a contract). This also applies to incoming staff mobility (single/separate mobility periods, events, project meetings).
- For determining an employee's social security coverage during work abroad, the legal basis for processing personal data is the controller's statutory obligation.
- For the annual data collection on outgoing and incoming staff mobility conducted by the Ministry of Education and Culture, the legal basis for processing personal data is also the controller's statutory obligation.

Processed categories and storage times of personal data

Personal data being processed:

- In connection with outbound staff mobility from Turku University of Applied Sciences, the following data is generally collected: name, nationality, gender, date of birth, work contact details, job title, field of
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education, organizational placement, and years of work experience.

This data is required for the annual data collection by the Ministry of Education and Culture and for the grant provider of staff mobility.

- If the outbound staff mobility period requires an A1 certificate from the Finnish Centre for Pensions (ETK) to prove entitlement to Finnish social security, the data required for the A1 application is processed. ETK processes the data provided in the application as the data controller in accordance with its own privacy notice.
- For incoming international mobility, the following data is collected: name, contact details, nationality, country of origin, gender, home organization, position at the home organization, and field of education. This data is needed for the annual data collection by the Ministry of Education and Culture. Additional data required by the mobility program may also be collected, such as a CV and the personal data it contains.
- In connection with agreements related to international mobility, the contact details of mobility period contact persons are also processed.
- For event organization, additional data may be collected on a case-by-case basis, such as information about special dietary requirements.

Retention periods for personal data are governed by Turku UAS's data management plan. Examples:

- Data related to outbound Erasmus staff mobility is retained for 6 years from the end date of the mobility project.
 - Travel plans and expense reports are archived for 6 years. Accounting export lists are retained for 10 years.
 - Data related to incoming staff mobility is retained for a maximum of 5 years from the year in which the mobility period occurred.
 - For events, all data not needed for mobility statistics and reporting is deleted 6 months after the event.
 - Numeric mobility statistics submitted to the Ministry of Education and Culture are retained permanently.
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Regular information sources

Information about an employee going on an international mobility period is collected from the travel plan form filled out by the employee, directly from the employee, and from the HR system. Data needed for the statistics and reporting of international mobility is gathered from travel expense reports, the HR system, and staff profiles available on the intranet.

Incoming international visitors generally provide the data collected for statistical purposes themselves via a form designed for this purpose.

Personal data required for international events is collected directly from the participants.

Receivers or receiver groups of personal data

Information on staff mobility abroad is provided to the Finnish National Agency for Education, the Ministry of Education and Culture, and the European Commission or other funding bodies, as well as to authorities defined by law, in the manner they specify. In connection with applying for an A1 certificate, personal data is disclosed to the Finnish Centre for Pensions (ETK).

Within Turku University of Applied Sciences, information is shared with those who need it for their work duties. These include, for example, contact persons for incoming international exchange participants, coordinators of international affairs, and those responsible for organizing events.

For outbound staff mobility under a mobility programme, information is also disclosed to the receiving organization.

Information on incoming international guests and visitors is collected using a form in an external system.

Essential information regarding transfer of data to third countries (outside the EU or EEA countries)

Personal data is primarily not transferred to countries outside the EU/EEA area. In case the international mobility period takes place in a non-EU/EEA



country, personal data needed for arranging the visit may be transferred on a case-by-case basis.

Principles of data protection of the register

The data is accessed only by people whose tasks require access to the data. Access to the service is limited with user IDs and user rights.

Data subject rights

In accordance with the EU General Data Protection Regulation, the data subject has the right to

- obtain information on the processing of their personal data unless otherwise prescribed by law
- review their personal data and rectify incorrect or missing data
- have their personal data erased (not applicable when the legal basis for processing personal data is the Controller's legal obligation or a task carried out in the public interest or the exercise of public authority)
- restrict the processing of their personal data
- object the processing of their personal data when the legal basis for processing personal data is public or legitimate interest
- ask for the personal data they have submitted themselves to be transferred from one controller to another when the legal basis for processing personal data is consent or contract
- notification obligation of the controller on the rectification/erasure/restricting of processing of personal data
- not be subject to automated decision-making (the data subject may permit automated decision-making through giving their consent).

The data subject may use their rights by contacting the contact person or DPO listed in the beginning of the privacy notice. More information concerning the rights of the data subject can be acquired from the contact person and/or DPO.



If processing of personal data does not require identification of the data subject without further information and the Controller cannot identify the data subject, the right to review, rectify, erase or transfer personal data and the right to restrict the processing of personal data are not applied and thus the Data Controller is not subject to the related reporting obligation.

The data subject has the right to file a complaint to the Office of the Data Protection Ombudsman if they think that the processing of their personal data conflicts with the valid data protection legislation. Contact details of the Turku UAS Data Protection Officer can be found in the beginning of the privacy notice.